REMARKS

In the Office Action of 1/24/08, claims 1-16, 18-23, and 59-67 were rejected. In this Amendment, claims 4, 5, 9, 10, 20, 21, and 59-67 have been canceled and claims 68-82 have been added. Accordingly, claims 1-3, 6-8, 11-16, 18-19, 22-23, and 68-85 will be pending after entry of this Response.

I.   Objections to the Specification:

In the Office Action, the Examiner objected to the specification as failing to provide proper antecedent basis for the claimed subject matter. The claims have been amended in accordance with the Examiner's objections.

II.   Rejections Under 35 U.S.C. 112

In the Office Action, the Examiner rejected claims 1-16, 18-23, and 59-67 under 35 U.S.C. 112, first paragraph, as failing to comply with the written description. The claims have been amended in accordance with the Examiner's objections.

III.   Rejections under 35 U.S.C. 102 and 103

In the Office Action, the Examiner rejected claims 1-12 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent App. No. 2001/0049677 A1 (hereinafter Talib), rejected claims 13-16 and 18-23 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,275,811 (hereinafter Ginn), in view of Knepfle et al. (hereinafter Knepfle), and further in view of Talib, rejected claims 59-64 under 35 U.S.C. 103(a) as being unpatentable over Talib in view of U.S. Patent No. 5,953,718 (hereinafter Wical), rejected claims 65-67 under

35 U.S.C. 103(a) as being unpatentable over Ginn, in view of Knepfle, in view of Talib, and further in view of Wical.

Applicants respectfully submit that the cited references, taken alone or in combination, fail to disclose, teach, or even suggest claim 1. As amended, claim 1 recites a method for searching a content database stored in computer storage, the content database including a plurality of records each containing multiple fields of information, the method comprising the steps of:

> maintaining a structure database in computer storage in which each record is parsed into one or more record categories, each record category having zero or more sub-categories and one or more fields of information, the structure database containing, for each record category, information defining the data structure of the record category;
> receiving a search query comprising one or more query categories, each query category comprising zero or more sub-categories and one or more selections from a user;
> determining, for each query category, the data structure of the query category based on the data structure of a corresponding record category;
> for each of one or more records, <u>performing a correlation between the data structure of each query category and the data structure of the corresponding record category</u> to produce a relevance value for the record, wherein performing the correlation comprises:
>> for each data structure of a query category, generating a <u>selection tree</u> comprising a node representing the query category, sub-nodes representing the sub-categories and selections, and <u>weights</u> for each node and sub-node assigned based on the selections from the user, and
>> for each data structure of the corresponding record category, generating a <u>data tree</u> comprising a node representing the record category, sub-nodes representing the sub-categories and fields of information, and <u>weights</u> for each node and sub-node assigned based on the level of the node or sub-node in the data tree or based on the selections from the user, and <u>using a correlation algorithm to correlate the weights of the data tree with the weights of the selection tree</u> to produce a relevance value for the corresponding record category; and
> as a response to the search query, selecting records in the content database based upon the relevance values for the one or more records.
> [Emphasis added.]

The cited references, alone or in combination, fail to teach or suggest each limitation of claim 1. For example, none of the references teach or suggest <u>performing a correlation between the data structure of each query category and the data structure of the corresponding record category</u>, wherein performing the correlation comprises, for each data structure of a query category, generating a selection tree having weights for each node and sub-node and, for each data structure of the corresponding record category, generating a data tree having weights for each node and sub-node, and <u>using a correlation algorithm to correlate the weights of the data tree with the weights of the selection tree</u> to produce a relevance value for the corresponding record category.

The Examiner states that Wical discloses that the relevance value for a record indicates a degree of similarity between the categories and sub-categories of the search query and the categories and sub-categories of the record. Wical discloses a search and retrieval system that processes a query to identify one or more topics related to the query, selects document themes relevant to the query, and then selects point of view gists, based on the document themes, that have a slant towards the topics related to the query (see Abstract). Column 17, lines 58-65 of Wical (which the Examiner cites) states that:

> The links and cross references on the knowledge base 155 directed graph further include distance weights. In general, the distance weights provide a quantitative value to <u>indicate the strength of the linguistic, semantic, or usage relationship between two categories/terms</u>. FIG. 6 also shows distance weights directly above the links and cross references for a corresponding association. In one embodiment, associations have distance weights ranging from 1-10.
> [Emphasis added.]

Column 2, lines 58-65 of Wical (which the Examiner cites) states that:

> ...the search and retrieval system uses <u>themes</u> of the

repository documents to generate the research documents. The themes generally define the overall content of the documents. For this embodiment, to process a query, the search and retrieval system <u>selects themes relevant to the query</u>, and then selects documents that contain the themes selected…The knowledge base includes a directed graph that links terminology having a <u>lexical, semantic or usage association</u>. Through use of the knowledge base, an expanded set of query terms are generated, and research documents are compiled that include point of view gists relevant to the expanded set of query terms…during document processing, the content processing system identifies the <u>themes</u> for a document, and classifies the documents, including themes identified for the documents, in categories of the knowledge base.

[Emphasis added.]

As such, the search and retrieval system of Wical based on similarities in theme, lexicon, semantics (meaning), or usage of a query and the content documents. No where in Wical is it taught or suggested that a correlation is performed between the <u>data structures</u> of a query category and a corresponding record category, wherein performing the correlation comprises generating a selection tree having weights and a data tree having weights and using a correlation algorithm to <u>correlate the weights of the data tree and the selection tree</u>. Applicants respectfully request that the Examiner cite the precise portion(s) of Wical that disclose a correlation of two data structures and a correlation of the weights of two trees for use in a searching process for records.

For the above reasons, Applicants respectfully submit that independent claim 1 is in allowable form. Claims 2-3 are dependent upon claim 1 and thus are also in allowable form. Independent claim 6 is a system claim reciting limitations similar to claim 1 and is allowable for at least the same reasons as claim 1. Claims 7-8 and 11-12 are dependent upon claim 6 and thus are also in allowable form. Claim 13 contains similar limitations of upon claim 13 and thus are also in allowable form.

IV. New Claims

New claims 68-85 have been added. Claims 68-73 are dependent upon claim 1 and thus are also in allowable form. Claims 74-79 are dependent upon claim 6 and thus are also in allowable form. Claims 80-85 are dependent upon claim 13 and thus are also in allowable form.

CONCLUSION

In view of the foregoing, Applicants respectfully believe that all pending claims are patentable and are in condition for allowance. Such allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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